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RICHARD W. WIEKING
U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SECURITIES AND EXCHANGE COMMISSION

Plaintiff,

vs.

ROBERT C. BROWN, JR. AND TREBOR COMPANY
(AKA TREBOR INVESTMENT COMPANY, TREBOR
SEMINARS, TREBOR GROUP AND TREBOR GROUP
FUND),

Defendants,

and

DUANE EDDINGS, CDC GLOBAL, INC. AND WISE
INVESTORS SIMPLY EXCEL, LLC,

Relief Defendants.

CV

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EX PARTE APPLICATION FOR
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE RE PRELIMINARY
INJUNCTION

Plaintiff Securities and Exchange Commission (the "Commission") applies for a temporary restraining order prohibiting defendants Robert C. Brown, Jr. and Trebor Company (aka Trebor Investment Company, Trebor Seminars, Trebor Group and Trebor Group Fund) from committing violations of the antifraud provisions of the federal securities laws, freezing assets of the defendants and the relief defendants, requiring defendants to repatriate assets, prohibiting defendants from

1 destroying documents, requiring the defendants to provide an accounting, and authorizing immediate
2 discovery, all as set forth in more detail in the proposed temporary restraining order lodged by the
3 Commission. In addition, the Commission applies for an Order to Show Cause Regarding
4 Preliminary Injunction.

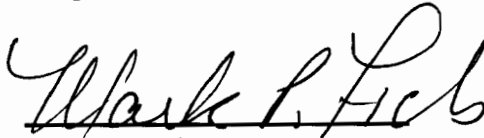
5 The Commission makes this application pursuant to Local Rules 7-10 and 65-1 and Federal
6 Rule of Civil Procedure 65(b). The Commission is authorized to make this application and the Court
7 is authorized to grant a temporary injunction or restraining order and other equitable relief, without
8 bond, pursuant to 15 U.S.C. §§ 77t(a), 78u(d)(1), and 80b-14.

9 This application is supported by the Commission's memorandum of points and authorities,
10 the declarations of Mark P. Fickes, Jeremy Pendrey, William Michael McCombe, Teresa Bunch,
11 Patrick Whitfield, and all materials attached to the declarations, and such other oral or written
12 evidence as may be presented at the hearing. As detailed in those papers, the Commission requests
13 the immediate assistance of the Court in preventing the further misappropriation of investor funds by
14 defendants. Defendants have misappropriated more than \$20 million from hundreds of investors by
15 guaranteeing phenomenal returns to investors. Defendant Robert Brown used investors' money as a
16 personal slush fund, paying for lavish personal expenses such as limousine services and expensive
17 shopping trips with his girlfriend. Brown is currently attempting to raise additional money by
18 promising profits of 30% to 40% *per month*. These facts demonstrate that the defendants have
19 engaged in violations of the federal securities laws and that there exists an immediate and irreparable
20 risk of injury to investors and to the public unless relief is granted.

21 The Commission applies for this injunctive relief on an *ex parte* basis. Pursuant to Local
22 Rules 7-10 and 65-1(b), the Commission's staff notified defendants' counsel and the relief defendants
23 of this application.

24 Dated: July 23, 2008

Respectfully submitted,

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27 Mark P. Fickes
28 Attorney for Plaintiff
Securities and Exchange Commission